

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SALPAI INC.

*Plaintiff,*

v.

GEORGE S. BELLAS, ESQ. and  
ZELENY SOLUTIONS, INC.,

*Defendants.*  
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CASE NO. 21-cv-02677

Hon. Judge Jed S. Rakoff

**NOTICE OF MOTION TO DISMISS AND TO COMPEL ARBITRATION  
BY DEFENDANT GEORGE S. BELLAS**

PLEASE TAKE NOTICE that Pursuant to Federal Rules of Civil Procedure 12(b)(1) & (2) and Section 4 of the Federal Arbitration Act, 9 U.S.C. §§ 4, and in accordance with the Court's Individual Rules of Practice, Defendant George S. Bellas, Esq. ("Mr. Bellas"), through the undersigned counsel, hereby moves this Court to dismiss Plaintiff Salpai Inc.'s Complaint in this action for lack of personal jurisdiction over Mr. Bellas and to compel arbitration pursuant to the terms of the written arbitration provision contained in the written agreement by and between Plaintiff, Mr. Bellas, and Defendant Zeleny Solutions, Inc. In support of this Motion, Mr. Bellas submits an accompanying Memorandum of Law and Declaration of George S. Bellas, Esq.

The following schedule shall apply to the consideration of this Motion:

Mr. Bellas' Motion shall be filed and served this 17<sup>th</sup> day of May 2021.

Any answering papers shall be filed and served on June 7, 2021.

A reply paper shall be filed and served on June 17, 2021.

Oral argument has been scheduled for June 24, 2021 at 4:00 PM via videoconference.

Dated: May 17, 2021

/s/ Paul R. Dehmel

Paul R. Dehmel, Esq.

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*Attorneys for Defendant George S. Bellas, Esq.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of May, 2021, I caused a copy of the foregoing to be served via electronic mail on all counsel of record.

/s/ Paul R. Dehmel

Paul R. Dehmel, Esq.

**Ulmer & Berne LLP**

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